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7 UNITED STATES DISTRICT COURT  
8 EASTERN DISTRICT OF WASHINGTON  
9 (HONORABLE JOHN T. RODGERS)

10 UNITED STATES OF AMERICA, )  
11 ) 2:21-CR-001-WFN  
12 Plaintiff, )  
13 vs. ) MOTION TO MODIFY THE  
14 ) CONDITIONS OF RELEASE  
15 PETER J. YEAGER, )  
16 )  
17 Defendant. ) **Notice of Hearing on Motion**  
18 ) May 14, 2021 at 6:30 pm  
19 \_\_\_\_\_)

20 PETER J. YEAGER, through counsel, STEPHEN R. HORMEL for Hormel  
21 Law Office, LLC, moves the Court to modify the conditions of release to permit  
22 him take two walks per day, outside and near his residence.

23 Mr. Yeager previously requested a condition of release to permit him up to  
24 two hours of exercise a day, outside of his residence. At the hearing, this Court  
25 asked for more specifics after Mr. Yeager was released.

26 Mr. Yeager is requesting the he be permitted to take two a day. He would  
27 walk one and a half miles up a road adjacent to his residence and back. He is  
asking that he be permitted take a three-mile walk from 7:00 am to 8:00 am and

1 another walk at 7:00 pm to 8:00 pm each day. This routine would assist Mr.  
2 Yeager in maintaining his mental status.

3  
4 Counsel has contacted both AUSA Dominique Park and UPSO Phil Casey.  
5 Both indicated they do not object to the requested modification.

6 Therefore, it is requested that the Court enter an order modifying the  
7 conditions of release to permit Mr. Yeager to take a walk twice daily, one from 7:00  
8 am to 8:00 am and the other from 7:00 pm to 8:00 pm, outside and near his  
9 residence. It is also requested the Court expedite hearing on this motion.  
10

11 Dated: May 13, 2021.

12  
13 Respectfully Submitted,

14 *s/ Stephen R. Hormel*

15 WSBA #18733

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Dominique Park, Assistant United States Attorney.

*s/ Stephen R. Hormel*  
WSBA #18733